

BellSouth Telecommunications, Inc. Legal Department

1025 Lenox Park Boulevard Suite 6C01 Atlanta, GA 30319-5309

bennett.ross@bellsouth.com

Bennett L. Ross

General Counsel - Georgia

404 986 1718 Fax 404 986 1800

July 1, 2003

RECEIVED

JUL U 1 2003

EXECUTIVE SECRETARY G.P.S.C.

DELIVERED BY HAND

Mr. Reece McAlister Executive Secretary Georgia Public Service Commission 244 Washington Street, S.W. Atlanta, Georgia 30334-5701

Re:

Performance Measurements for Telecommunications Interconnection, Unbundling and Resale; Docket No. 7892-U

Dear Mr. McAlister:

Consistent with the Commission's July 19, 2002 Order, BellSouth Telecommunications, Inc. ("BellSouth") is filing a Notification Report for the August 2003 data month and a Preliminary Notification Report for the data month of September 2003. These proposed changes will be discussed at the July 7, 2003 industry conference call.

There are two additional matters that BellSouth would like to bring to the attention of the Commission and the parties. First, in its February 2003 Data Notification filed on January 2, 2003, BellSouth provided notice of a coding change to ensure that all completed orders are reported in certain provisioning measures and to address CLEC requests that more records straddling multiple months be included in the performance data. This change, which was Item No. 4 on the February 2003 Data Notification, was not implemented correctly, and BellSouth will be making additional coding changes with June 2003 data to address this problem.

Second, in its April 2003 Data Notification filed on March 3, 2003, BellSouth provided notice of a coding change to capture correctly in the maintenance and repair measures sub-rate 64 kbps services associated with an ISDN PRI. This change, which was Item No. 20 on the April 2003 Data Notification, was not implemented correctly, and BellSouth will be making additional coding changes with June 2003 data to address this problem.

Mr. Reece McAlister July 1, 2003 Page 2

Enclosed herein please find an original and seventeen (17) copies, as well as an electronic version, of these Data Notification Reports. I would appreciate your filing same in the above-referenced docket and returning the two (2) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your attention to this matter.

BLR:nvd Enclosures

cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)

Mr. Patrick Reinhardt (w/enclosure) (via electronic mail)

Parties of Record (w/enclosure) (via electronic mail)

496506/496485/496526

PROPOSED AUGUST 2003 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the August 2003 data month. Results for the August 2003 data month will be posted as follows:

Preliminary results September 21, 2003 Final results September 30, 2003

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) Affected Measures: O-7, O-8, O-9, and O-11

Description of Change: Currently, PMAP is reporting based on the first inbound timestamp for some LSRs received from TAG. The appropriate timestamp to use, as pointed out in response to GA Exception 181, is the last inbound timestamp. Based on February 2003 data, the average change in duration for those LSRs having multiple timestamps was 11 seconds. BellSouth proposes to change the PMAP code to use the last inbound timestamp. This proposed change was Item (2) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ 3452)

Impact of Change: For FOC data reported in February 2003 there would be no change to the reported results.

Provisioning Measurements

(2) Affected Measures: P-9

Description of Change: For the retail analog "ADSL Provided to Retail", BellSouth currently includes the Troubles reported on the data or "virtual" portion of the circuit as well as the voice or "physical" portion of the circuit. However, troubles received on wholesale circuits only deal with the physical line troubles, since all virtual trouble issues should be tested and resolved by the CLEC. This causes a mismatch between the type of

data reported for retail vs. wholesale in the durations of the BellSouth retail and CLEC DSL troubles. BellSouth proposes excluding from the ADSL retail analog any trouble closed out to a virtual portion of the circuit. This change is related to Item (7) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ3344)

Impact of Change: Based on February 2003 data, the Percent Provisioning Troubles within 30 will be reduced 0.33%.

(3) Affected Measures: P-4

Description of Change: Currently, retail orders and some CLEC orders are being included in this measure, even though the customer has caused an extended interval due to an end user caused missed appointment. Consistent with the SQM, BellSouth proposes excluding those orders where the end user has extended the completion interval. This proposed change was Item (4) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ3457)

Impact of Change: In March 2003 for BellSouth Retail in Georgia, this measure reflected extended intervals for 1.15% of the orders. For CLECs, extended intervals were reported for .68% of the orders.

M & R Measurements

(4) Affected Measures: M&R-1, M&R-2, M&R-3, M&R-4 & M&R-5

Description of Change: For the retail analog "ADSL Provided to Retail", BellSouth currently includes the Troubles reported on the data or "virtual" portion of the circuit as well as the voice or "physical" portion of the circuit. However, troubles received on wholesale circuits only deal with the physical line troubles, since all virtual trouble issues should be tested and resolved by the CLEC. This causes a mismatch between the type of data reported for retail vs. wholesale in the durations of the BellSouth retail and CLEC DSL troubles. BellSouth proposes excluding from the ADSL retail analog any trouble closed out to a virtual portion of the circuit. This proposed change was ltem (7) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ3344)

Impact of Change: Based on February 2003 data, the Customer Trouble Report Rate is reduced from 2.74% to 2.4%. Maintenance Average Duration for ADSL provided to retail will increase by an average of .89 hours. Repeat Report Rate will be reduced by an average of .003% across all states for ADSL provided to retail.

(5) Affected Measures: M&R-1, M&R-2, M&R-3, M&R-4, & M&R-5

Description of Change: Currently, some CLLI codes are not being recognized for wire center determination. BellSouth proposes incorporating a new table into the data model for wire center determination. This proposed change was Item (8) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ3417)

Impact of Change: Minimal. The Customer Trouble Report Rate will increase 0.19% region wide.

PRELIMINARY SEPTEMBER 2003 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the September 2003 data month. Results for the September 2003 data month will be posted as follows:

Preliminary results October 21, 2003 Final results October 31, 2003

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) Affected Measures: OSS-1, OSS-2, and all Pre-Ordering & Ordering Measures

Description of Change: In anticipation of Encore Release 13.2 and the associated modifications to the sequence of data fields from BellSouth's source systems (e.g., LEO, LESOG, etc.), BellSouth proposes changes to PMAP to ensure that data is being correctly captured and reported.

Impact of Change: None

(2) Affected Measures: O-1, O-2, and O-11

Description of Change: BellSouth proposes to change the "TAG" label on the measure to read "TAG/LENS/XML" to match the systems that are currently reported as part of the current "TAG" reporting structure. (RQ3696)

Impact of Change: None.

Provisioning Measurements

(3) Affected Measures: P-9

Description of Change: Currently PMAP does not match ADSL troubles to ADSL orders, Line Share troubles to Line Share orders, nor does it match Line Splitting troubles to Line Splitting orders. Any trouble, regardless of whether it physically affects voice or data is being counted in these disaggregations. BellSouth proposes to change the PMAP code to correctly match the trouble ticket to the appropriate service order product. (RQ2413)

Impact of Change: Based on March 2003 data, the results will change as follows: ADSL provided to Retail will change from 16.32% to 9.94% regionally and CLEC Line Share will change from 10.66% to 3.86% regionally.

(4) Affected Measures: P-3

Description of Change: Currently, certain denial and restoral orders are being classified inappropriately as missed appointments. Denial/restoral orders are bulk completed in the switch. However, the recorded completion date is the date that SOCS completes the bulk orders reflecting the denial and restoral of service. If the bulk completion occurs after the appointment day, these orders are being incorrectly counted as a Bell South missed appointment even though there is no missed appointment code on the order. If the appointment was missed, the order would reflect a missed appointment code input by the RCMAG organization. Bell South proposes counting only records with a valid missed appointment code in the numerator of this measure. (RQ3074)

Impact of Change: For May 2003 for both Retail and Wholesale, 198 of 3,337,331 records (0.0005%) were marked as missed appointments without a valid missed appointment code.

(5) Affected Measures: P-5 (All States Except Georgia)

Description of Change: Currently, the ending timestamp for Average Completion Notice Interval is the first timestamp indicating that a completion notice was sent. In some cases, this initial notice is misleading because the order may be updated before it goes to final completion status and a final notice is sent. The code will be modified to only report the notify timestamp when the order goes to final completion status. (RQ3914)

Impact of Change: In May 2003, for 294,837 records in Alabama, the average duration was 1.117 hours. With this change, the average duration would be 1.120 hours.

Special Access Measurements

(6) Affected Measures: SA-2 (Georgia Only)

Description of Change: Currently, in the numerator of the SA-2 (FOC Receipt Past Due) report, BellSouth is counting ASRs that have received a past due FOC during the month in addition to ASRs that have not received a FOC and are past due at the end of the month. The numerator of this measurement should only include ASRs that have not received a FOC and are past due at the end of the reporting month. This proposed change will correct this issue. (RQ3676)

Impact of Change: BellSouth continues to investigate the impact of the proposed change and will quantify this impact as soon as possible.

(7) Affected Measures: SA-9 (Georgia and Tennessee only)

Description of Change: The posted numerator and denominator for the Annualized Failure Rate part of this measure are incorrect. Currently, total troubles are reported as the numerator and the sum of lines in service for the same period is reported as the denominator. Consistent with Appendix G of the SQM, BellSouth proposes to change the reporting and calculation to use average troubles for the preceding months as the numerator and average lines in service for the same preceding months as the denominator. (RQ3747 & RQ3748)

Impact of Change: None.

(8) Affected Measures: SA-5, SA-6 and SA-7 (Georgia, Florida and Tennessee only)

Description of Change: Currently, PMAP is miscalculating the duration for these measures by improperly including weekends and holidays in the calculation if the completion date for the duration falls on a weekend or a holiday. BellSouth proposes correcting the calculation. (RQ3814)

Impact of Change: For May 2003, 224 of 38,947 records had an additional day in the durations. For SA-6, ASR Receipt Date to FOC Due Date, 6 out of 9,827 records were affected, for ASR Receipt Date to Order Completion Date, 34 out of 18,356 records were affected and for ASR Receipt Date to Requested Due Date, 41 out of 9,822 records were affected. For SA-7, Past Due Circuits, 143 out of 143 records were affected.

PARTIES OF RECORD

Kristy R. Holley, Division Director Consumers' Utility Counsel 47 Trinity Avenue, S.W. 4th Floor Atlanta, GA 30334-4600 404-656-3982 (o) kristy.holley@cuc.oca.ga.us

Suzanne W. Ockleberry AT&T 1200 Peachtree Street, NE Suite 8100 Atlanta, GA 30309 404-810-7175 (o) sockleberry@att.com

Charles V. Gerkin Jr. Attorney at Law Suite 610 – PMB 307 4135 LaVista Road Tucker, GA 30085-5003 770-414-4206 (o) charles.gerkin@attbi.com

Jeremy D. Marcus
Blumenfeld & Cohen
[Co-Counsel for Rhythm, aka ACI Corp.]
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036
202-955-6300 (o)
jeremy@technologylaw.com

John P. Silk Georgia Telephone Association 1900 Century Boulevard, Suite 8 Suite 8 Atlanta, GA 30345 404-321-5368 (o) jsilk@gta.org Newton M. Galloway Smith, Galloway, Lyndall & Fuchs Suite 400 First Union Bank Tower 100 South Hill Street Griffin, GA 30229 770-233-6230 (o) ngalloway@sglf-law.com

Walt Sapronov Gerry & Sapronov, LLP Three Ravinia Drive Suite 1455 Atlanta, GA 30346-2131 770-395-9100 (o) info@gstelecomlaw.com

Frank B. Strickland
Strickland Brockington & Lewis
[Counsel for e.spire]
Midtown Proscenium – Suite 2000
1170 Peachtree Street. N.E.
Atlanta, GA 30309
404-885-5741 (o)
fbs@sbllaw.net

William Bradley Carver Alston & Bird LLP One Atlantic Center 1201 West Peachtree Street Atlanta, GA 30309-3424 404-881-7000 (o) bcarver@alston.com

Daniel S. Walsh Attorney General Office Department of Law-State of Georgia 40 Capitol Square, S.W. Atlanta, GA 30334-1330 404-657-2204 (o) dan.walsh@law.state.ga.us Stephen S. Melnikoff General Attorney - Regulatory Law Office Troutman Sanders LLP U. S. Army Legal Services Agency Department of the Army 901 N. Stuart Street, Suite 700 Arlington, VA 22203-1837 703-696-1643 (o) stephen.melnikoff@hqda.army.mil

Peter C. Canfield Dow Lohnes & Albertson One Ravinia Drive, Suite 1600 Atlanta, GA 30346 770-901-8800 (o) pcanfield@dlalaw.com

Anne E. Franklin Arnall Golden & Gregory, LLP [Counsel for Broadslate, NorthPointe] 2800 One Atlantic Center 1201 West Peachtree Street Atlanta, GA 30309 404-873-8536 (o) anne.franklin@agg.com

D. Mark Baxter Thomas M. Browder, III Stone & Baxter, LLP 577 Mulberry Street **Suite 1111** Macon, GA 31201 478-750-9898 (o) mbaxter@stoneandbaxter.com tbrowder@stoneandbaxter.com

David I. Adelman, Esquire Charles B. Jones III, Esquire Hayley B. Riddle, Esquire Sutherland, Asbill & Brennan LLP 999 Peachtree Street, N.E. Atlanta, GA 30309-3996 (404) 853-8106 (o) [Counsel for ITC^DeltaCom, WorldCom] diadelman@sablaw.com cbjones@sablaw.com hbriddle@sablaw.com

Charles F. Palmer 5200 NationsBank Plaza 600 Peachtree Street, NE Atlanta, GA 30308-2216 404-885-3402 (o) charles.palmer@troutmansanders.com

Nanette S. Edwards Regulatory Attorney ITC^DeltaCom 4092 S. Memorial Parkway Huntsville, AL 35802 256-382-3856 (o) nedwards@itcdeltacom.com

William R. Atkinson Sprint Communications Company L.P. 3065 Cumberland Boulevard Mailstop GAATLD0602 Atlanta, GA 30339 404-649-4882 (o) bill.atkinson@mail.sprint.com

Genevieve Morelli Andrew M. Klein Kellev Drve & Warren LLP [Counsel for KMC Telecom] 1200 Nineteenth Street, N.W. Washington, DC 20036 202-877-1257 (o) gmorelli@kelleydrye.com aklein@kelleydrye.com

Mark M. Middleton, Esquire Mark M. Middleton, P.C. 4231 Quail Ridge Way Norcross, GA 30092-1318 404-806-0808 (o) [Counsel for CTAG] mark@middletonlaw.net

Charles A. Hudak Friend, Hudak & Harris, LLP Three Ravinia Drive Suite 1450 Atlanta, GA 30346-2131 770-399-9500 (o) chudak@fh2.com

Dulaney L. O'Roark III, Esquire WorldCom, Inc.
Concourse Corporate Center Six 6 Concourse Parkway, Suite 3200 Atlanta, GA 30328
[Counsel for WorldCom, Inc.] 770-284-5498 (o) de.oroark@wcom.com

Eric J. Branfman Swidler & Berlin 3000 K Street, N.W. Suite 300 Washington, DC 20007 202-945-6940 (o) ebranfman@swidlaw.com Charles E. Watkins, Esquire
Senior Counsel
Covad Communications Company
1230 Peachtree Street, N.E., 19th Floor
Atlanta, GA 30309
404-942-3492 (o)
gwatkins@covad.com
jbell@covad.com

Rose Mulvany Henry, Esquire Birch Telecom of the South, Inc. 2020 Baltimore Avenue Kansas City, MO 64108 [Counsel for Birch Telecom] 816-300-3000 (o) rmulvany@birch.com